RESEARCH REPORT:
Policy and Practice in Ethnic Data Collection and Monitoring
COUNTING US IN - HUMAN RIGHTS COUNT!
This report has been prepared by Pavee Point Traveller and Roma Centre (‘Pavee Point’) in response to the data deficit on minority ethnic groups in Ireland, specifically the dearth of data on Irish Travellers and Roma. Pavee Point has been working to challenge racism and promote Traveller and Roma inclusion in Ireland since 1985. The organisation works from a community development perspective and promotes the realisation of human rights and equality for Travellers and Roma in Ireland. The group is comprised of Travellers, Roma and members of the majority population, who work together in partnership to address the needs of Travellers and Roma as minority ethnic groups experiencing exclusion, marginalisation and racism.

Travellers are a minority ethnic group, indigenous to the island of Ireland. Travellers maintain a shared history, language, traditions and culture. Nomadism was an integral part of Traveller culture, but many Travellers are no longer nomadic, either by choice or due to the lack of support for and criminalisation of nomadism. According to Census 2011, there are 29,495 Irish Travellers living in the Republic of Ireland, accounting for approximately 0.64% of the total population (CSO, 2012a). These figures reflect a count of ascertained Travellers only and may be considered a conservative estimate, as the All Ireland Traveller Health Study (2010) establishes the Traveller population at 36,224 in the Republic of Ireland. Given its relatively small population and lack of ethnic identifiers in official data collection systems, the Traveller community is consistently absent from official statistics, particularly in the State’s submissions to the European Union. Nevertheless, despite representing less than 1% of the nation’s population, Travellers are widely recognised as one of the most marginalised and severely disadvantaged groups in Irish society. Similarly, Roma have been identified by various human rights organisations and monitoring bodies as a socially disadvantaged group who experience structural and systematic discrimination across Europe. According to Thomas Hammarberg, previous Council of Europe Commissioner for Human Rights, “Europe has a shameful history of discrimination and severe repression of the Roma. There are still widespread prejudices against them in country after country on our continent” (Hammarberg, 2006: para 14). Considered as one of the largest minority ethnic groups in Europe, ‘Roma’ is used as an umbrella term for people who self-identify as belonging to Roma, Sinti, Kale and other groups with a nomadic tradition, this includes Irish Travellers. Given its broad definition, it is difficult to establish a precise count of the Roma population in any given country, as EU Member States vary in their interpretation and application of the term. Moreover, there is very little accurate and reliable data available about Roma in Ireland because data is collected on nationality rather than ethnicity. However, conservative estimates place the Roma population in Ireland between 3,000 and 6,000, with most deriving from Romania and Slovakia (Pavee Point, 2002; Pavee Point and HSE, 2012; Drew et al., 2012). This lack of data presents serious challenges in developing effective policies and appropriate services for Roma in Ireland.

Ethnic equality monitoring in Ireland remains the exception rather than the norm, with only a small number of public bodies routinely collecting, monitoring and evaluating ethnic data. Generally, where ethnic data collection exists it is not used constructively, primarily resulting in very poor statistical information. In addition to the lack of systematic and consistent data, ethnic identification has been ascribed to minority groups including Travellers and Roma, rather than the application of a universal question on ethnicity through voluntary self-identification. Information is not disaggregated, analysed or provided to relevant stakeholders within an appropriate timeframe. Such practices reflect a significant breach and disregard for human
rights standards and data protection principles. Various national and international institutions, such as the Advisory Committee to the Framework Convention for the Protection of National Minorities\(^6\) (FCPNM), the European Commission against Racism and Intolerance\(^7\) (ECRI) and Committee on the Elimination of Racial Discrimination\(^8\) (CERD) have observed Ireland's data deficit and have urged the State to develop a standardised approach to data collection in accordance with relevant human rights standards. This report reiterates these recommendations and highlights the clear need for Ireland to mainstream ethnic data collection practices, in line with relevant human rights standards,\(^9\) as well as obligations under European Union institutions.

Ethnic equality monitoring is essential in order to identify incidences and patterns of racism and discrimination and to develop cost-effective and evidence-based social policies to address them. This has been widely recognised by various national and human rights international bodies and organisations, academics, NGOs and members of minority ethnic groups (EU-MIDIS, 2009). The lack of accurate data is understood as "one of the biggest obstacles to the development, implementation, assessment and transferability of evidence-based policies whose impact can be effectively evaluated" (European Commission, 2010: 24). Statutory bodies and policymakers have also increasingly supported the need for reliable and ethnic data to inform efficient, well-targeted, and well-implemented policies to combat discrimination and advance social inclusion (Goldston, 2006; Makkonen, 2007). Ireland requires disaggregated data as part of its strategic planning, as currently policymakers operate within a vacuum, lacking accurate and reliable information to develop and plan cost-effective and evidence-based social and development policies. Put simply, unless policymakers have information on the extent and causes of inequalities they will not be able to develop effective interventions and policies and to monitor progress.

Information on ethnicity is necessary to develop knowledge on discrimination, establish objectives, monitor progress towards equality, evaluate the effectiveness of policy initiatives and develop targeted funding for innovative initiatives that deliver better outcomes to minority ethnic groups. Further, ethnically disaggregated data is critical to informing policy decisions and promoting equality of access, participation and outcomes in the areas of health, education, accommodation and employment. The collection and monitoring of ethnic data can be used to eliminate forms of discrimination in addition to justifying positive and affirmative action to ensure that the specific needs of minority ethnic groups are met (ECRI, 2006). Such measures are approved under the Equal Status Act 2000. As per the Equal Status Act, 2000, the nine grounds include:

1. gender;
2. marital status;
3. family status;
4. sexual orientation;
5. religion;
6. age;
7. disability;
8. race; and
9. membership of the Traveller Community.

Despite the well-documented benefits of ethnic equality monitoring, there are a number of sensitivities and barriers to the collection of disaggregated data (Donse et al., 2013; Fremont and Lurie, 2004), including:

- Privacy and confidentiality;
- Data misuse;
- Participation;
- Data collector discomfort;
- Categorization and technical issues; and
- Time and associated costs.
These tensions underline the need for adequate training and support for data collectors to ensure they understand the rationale for seeking such sensitive information and can alleviate the concerns of data subjects effectively and efficiently. Such sensitivities also highlight the importance of consultation and active participation of key stakeholders such as Pavee Point and other NGOs in the data collection, analysis and evaluation process as they can encourage self-identification among minority ethnic groups and can provide valuable insight into formulating and monitoring effective development programmes.

This report draws on a wide range of national and international experiences of ethnic equality monitoring and aims to contribute to the existing body of knowledge advocating the use of ethnic data as a tool to support inclusive policies, combat discrimination and promote equality of access, participation and outcome for minority ethnic groups in Ireland. The objectives are twofold: (i) to confirm the legality of ethnic data collection data protection legislation in Irish, European and international human rights law (ii) to examine the challenges and sensitivities in collecting ethnic data and identify best practice. The report also examines the extent to which Ireland currently engages in ethnic data collection and whether statistical data is used to inform policy.

The recommendations from this report provide a framework for the more effective collection and application of ethnic data in Ireland. Key recommendations include the need for official senior level endorsement of ethnic equality monitoring to ensure that public sector bodies routinely collect and publish ethnic data to inform good policy and practice. The Senior Officials Group on Social Inclusion is identified as the most appropriate group to endorse ethnic equality monitoring as it is chaired by the Department of the Taoiseach and maintains a broad overview of social inclusion issues. The group also present emerging topics to the Cabinet Committee on Social Inclusion and are responsible for policy developments related to meeting the objectives of social inclusion strategies. Endorsement would also include the formation of a National Steering Committee to develop and drive a dedicated Ethnic Equality Monitoring (EEM) Strategy in partnership with Travellers, Roma and other minority ethnic groups and implemented by all public sector bodies including: Departments of Health; Justice and Equality; Education and Skills; Environment, Community and Local Government.

Similarly, the report recognises the need for training and support for relevant government departments (HR, statistics and/or other sections) and data collectors across the public sector to ensure they are equipped, confident and skilled in implementing, monitoring and evaluating ethnic data. This includes the mandatory provision of anti-racism and cultural awareness training for all relevant staff and the resourcing of Traveller and Roma organisations to provide this training. While appropriate training and support for staff is fundamental to the success of ethnic equality monitoring, this report also recommends the targeted recruitment of data collectors from minority ethnic groups. Targeted recruitment of data collectors has been shown to have a significant impact on participation and willingness of minority ethnic groups to engage in the data collection process, in addition to illustrating positive role models from minority ethnic communities within the system.

There is a significant and compelling demand for a standardised approach to data collection in Ireland and the implementation of an ethnic identifier across all routine administrative systems, state agencies and surveys. The current status quo of an uncoordinated approach to data collection on an ad-hoc basis is inefficient and counterproductive as policymakers are unable to use small pockets of data to successfully devise cost-effective and sustainable policies. Equally, statutory agencies are unable to proactively plan efficient and effective services. Mainstreaming data collection practices, including the use of compatible data software would maximise the utility of data and equip both policymakers and statutory bodies with essential information required to make strategic and evidence-based decisions regarding policy and subsequent statutory actions.
RECOMMENDATION 1: 
Official senior level endorsement of Ethnic Equality Monitoring (EEM)

1.1 ‘Senior Officials Group on Social Inclusion’ endorsement and support is needed to ensure that government and state agencies conduct ethnic equality monitoring (inclusive of Travellers and Roma) to inform good policy and practice.

1.2 ‘Senior Officials Group on Social Inclusion’ should endorse the formation of a National Steering Committee to develop and drive a comprehensive EEM Strategy (see Recommendation 2). The National Steering Committee will report to the ‘Senior Officials Group on Social Inclusion’ on a periodic basis.

1.3 ‘Senior Officials Group on Social Inclusion’ endorsement should cover:

1.3.1 Promoting effective consultation between public sector bodies and Travellers, Roma and other minority ethnic groups in the collection, monitoring and evaluation of ethnic data.

1.3.2 Identifying mechanisms and resources required to implement and review ethnic equality monitoring within a human rights framework nationally.

1.3.3 Public and targeted campaign to inform people of the reasons of why such data is collected and affirm a commitment to human rights principles and ethical use of such data. Traveller organisations, Travellers and Roma must be central to this process.

1.3.4 Standard collection and publication of ethnic data across all routine administrative systems in line with human rights principles.

RECOMMENDATION 2: 
Establish a National Steering Committee to develop a comprehensive EEM framework

2.1 A National Steering Committee should be established to drive the development of an EEM framework and monitor progress. The committee should include officials from the Irish Human Rights and Equality Commission (IHREC), Central Statistics Office (CSO), Office of the Data Protection Commissioner (DPC), Health Information and Quality Authority (HIQA), relevant government departments, Traveller, Roma and other minority ethnic group organisations.

2.1.1 In driving the implementation of the EEM Strategy, the committee should ensure that ethnic categories evolve over time in consultation with minority ethnic groups and in accordance with self-identification and composition of the population. The committee should also consider the identification of intersectional categories covered under the nine equality grounds.

2.1.2 The committee should monitor and evaluate the implementation of the EEM Strategy and report on an annual basis to the ‘Senior Officials Group on Social Inclusion’. The committee should also provide progress reports to the National Statistics Board and make recommendations.
RECOMMENDATION 3:
The National Steering Committee to develop a clear EEM Strategy in partnership with Travellers, Roma and other minority ethnic groups

3.1 The National Steering Committee should develop a clear EEM Strategy in partnership with Travellers, Roma and other minority ethnic groups. In working to fulfill its mandate, the committee must identify:

- Concrete time-specific targets;
- Key performance indicators;
- Monitoring and evaluation mechanisms for measurable outputs;
- Sufficient funding for research on the development of standard guidelines and codes of practices in relation to the collection, analysis, use and dissemination of data;
- Budgets for actions identified in the Strategy;
- Implementing bodies for the Strategy; and
- A nominated individual at Senior Level who will have responsibility for actions outlined in the EEM Strategy and accountability for the timely completion of targets.

3.2 The National Steering Committee must ensure that the EEM Strategy makes provision for the development, piloting and implementation of guidelines and codes of practice within relevant sectors.

3.2.1. Guidelines and codes of practice must be rooted in a human rights approach and developed in partnership with Traveller organisations, Travellers and Roma.

RECOMMENDATION 4:
Public sector bodies should introduce training and targeted recruitment for data collectors where applicable and appropriate. To include:

4.1 Training and support for relevant government departments (HR, statistics and/or other sections) and data collectors across the public sector to ensure that they are equipped, confident and skilled in implementing, monitoring and evaluating ethnic data.

4.1.1 This includes the mandatory provision of anti-racism and cultural awareness training for all relevant staff and the resourcing of Traveller and Roma organisations to provide this training. This training should be embedded in professional training programmes and staff induction (where applicable).

4.2 Relevant to the size and scale of public body, the appointment of Human Rights and Equality Officers with responsibility for initiating, monitoring and overseeing the implementation of EEM. This will include embedding procedures in everyday work processes so that EEM becomes an institutionalised practice and ensures continuity regardless of staff-turnover.

4.3 Equality and anti-discrimination criteria as part of any future staff recruitment process. Person specifications should include commitment to anti-racist and equality perspectives.

4.4 Equality and anti-discrimination objectives in performance reviews and appraisals of staff, including for supervisors and managers.

4.5 Targeted recruitment of data collectors from minority ethnic groups (as appropriate).
RECOMMENDATION 5: Introduce a standardised ethnic identifier in routine administrative systems and in state surveys to comply with positive duty obligations, promote equality and combat discrimination. It is essential that the application of an ethnic identifier take place within a human rights framework.

5.1 Implementation of an ethnic identifier across all routine administrative systems and statutory agencies to monitor equality, participation and outcomes and to inform policy development and service delivery.

5.2 Implementation of an ethnic identifier across all state surveys such as SILC and the QNHS, to monitor equality, participation and outcomes and to contribute to national and EU policy and practice.

5.3 Data controllers should disclose the methodology used to collect ethnic data and where appropriate develop inclusive measures to redress the lack of representation in sampling. Stratified random sampling is one method to be considered.

5.4 Datasets should use standard ethnic classifications developed by the CSO to ensure consistency and cross-comparability of data. In line with best international practice, the CSO should regularly update ethnic classifications in accordance with self-identification and composition of the population.

5.5 Ethnic data must be disaggregated by gender and other relevant equality grounds to ensure that particular individuals within minority groups are included in policy and service planning. This is particularly pertinent for minority women such as Travellers and Roma who experience intersectional discrimination on the basis of gender and ethnicity.

5.6 Collected data should be used to develop responsive and effective inclusion policies, and to monitor and assess their impact on Traveller and Roma communities.

RECOMMENDATION 6: Public access to disaggregated data

6.1 Disaggregated data should be made available to key stakeholders and to the wider public in an accessible and user-friendly format on a bi-annual basis.

6.2 Data should be published on government, department and CSO websites.

RECOMMENDATION 7: Mainstreaming data collection practices across public sector bodies

7.1 Identification of resources that can support data collectors to collect standardised data and then, once collected, to maximise the utility of data.

7.2 Mainstream ethnic data collection practices through the development of a co-ordinated and standardised approach to data collection, including the utilisation of compatible data software, in line with relevant human rights standards and good practice principles.

This report is supported [in part] by a grant from the Foundation Open Society Institute in cooperation with the Open Society Initiative for Europe of the Open Society Foundations.
Full report can be found at:
http://www.paveepoint.ie/resources/data-portal/